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9 *Attorney for Plaintiff In conjunction with Legal Aid Center of*  
10 *Southern Nevada Pro Bono Project*

11 **UNITED STATES DISTRICT COURT**  
12 **DISTRICT OF NEVADA**

13 TERRELL DESHON KEMP, SR.,  
14 Plaintiff,

15 vs.

16 LAS VEGAS METROPOLITAN POLICE  
17 DEPARTMENT, et al.,  
18 Defendants.

CASE NO: 2:18-cv-00169-RFB-BNW

19 **STIPULATION AND ORDER TO EXTEND**  
20 **TIME FOR PLAINTIFF TO RESPOND TO**  
21 **DEFENDANTS HARDY'S AND**  
22 **SCHMIDT'S MOTION FOR SUMMARY**  
23 **JUDGMENT**  
24 (First Request)

25 COMES NOW, Plaintiff Terrell Deshon Kemp, Sr., ("Plaintiff"), by and through his  
26 counsel, Trevor J. Hatfield, Esq. of the law firm of Hatfield & Associates, Ltd., appearing *pro*  
27 *bono publico*, and Defendants Captain Nita Schmidt and Officer Hugh Hardy, ("LVMPD  
28 Officers") by and through their counsel, Lyssa S. Anderson, Esq., of the law firm of Kaempfer  
Crowell, and hereby stipulate and agree to extend the time for Plaintiff to Respond to Defendants  
Hardy's and Schmidt's Motion for Summary Judgment (ECF #85) due on March 15, 2021, to  
April 15, 2021.

This request is submitted pursuant to LR IA 6-1, 6-2 and 7-1 and is the parties' first  
request for an extension of time for Plaintiff to respond to Defendants' Motions for Summary  
Judgment.

Good cause exists for this extension, as the current coronavirus/COVID-19 pandemic has caused, and continues to cause, disruption to the practices of counsel involved in this case. In addition, Plaintiff is incarcerated in Ely State Prison and Plaintiff's Counsel has had difficulty communicating with him to formulate oppositions to Defendants' Motions for Summary Judgment. Additionally, three Motions for Summary Judgment have been filed in this matter and are comprised of voluminous documentation for Plaintiff's counsel and Plaintiff to review to formulate the Oppositions to the Motions for Summary Judgment.

Accordingly, Plaintiff shall have up to and including April 15, 2021, to respond to Defendant LVMPD Officers' Motion for Summary Judgment (ECF #85).

Dated this 12<sup>th</sup> day of March, 2021

**HATFIELD & ASSOCIATES**

*/s/ Trevor J. Hatfield*

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 Trevor J. Hatfield, Esq. (SBN 7373)  
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*Attorney for Plaintiff In conjunction with  
 Legal Aid Center of Southern Nevada Pro  
 Bono Project*

Dated this 12<sup>th</sup> day of March, 2021

**KAEMPFER CROWELL**

*/s/ Ryan W. Daniels*

By: \_\_\_\_\_  
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*Attorneys for Las Vegas Metropolitan  
 Police Department, Captain Nita Schmidt  
 and Officer Hugh Hardy*

IT IS SO ORDERED:



RICHARD F. BOULWARE, II  
 United States District Judge

DATED this 15th day of March, 2021.

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1 Dated this 12<sup>th</sup> day of March, 2021

2 **LEWIS BRISBOIS BISGAARD & SMITH, LLP**

3 */s/ Katherine J. Gordon*

4 By: \_\_\_\_\_

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9 *Attorneys for Defendants NaphCare, Inc.,*  
10 *Larry Williamson, M.D., and Ashley Komacsar,*  
11 *Director of Nursing*

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13  
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15  
16 **ORDER**

17 **IT IS SO ORDERED:**

18 \_\_\_\_\_  
19 UNITED STATES MAGISTRATE JUDGE

20 Dated: \_\_\_\_\_

21 CASE NO.: 2:18-cv-00169-RFB-BNW  
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